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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

NATIVE VILLAGE OF VENETIE  
TRIBAL GOVERNMENT, *et al.*,

Plaintiffs,

v.

DEBRA HAALAND, *et al.*,

Defendants

and

NORTH SLOPE BOROUGH, *et al.*,

Intervenor-Defendants.

Case No. 3:20-cv-00223-SLG

*Native Village of Venetie Tribal Government v. Haaland*, 3:20-cv-00223-SLG  
Joint Status Report and Mot. to Continue Stay

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## JOINT STATUS REPORT AND UNOPPOSED MOTION TO CONTINUE STAY

The Parties hereby respond to the Court's December 10, 2024, Text Order instructing the Parties to indicate what actions may be necessary to resume or resolve this litigation. ECF No. 104. Counsel for the parties in all four lawsuits challenging the 2020 Leasing Program have conferred. In each of the four cases, the Parties are filing a joint status report, in which Plaintiffs and Defendants request, and no party opposes, a continued stay until February 28, 2025. A continued stay is appropriate, because this case may be impacted by a decision in a separate pending case as well as forthcoming agency actions.

Additional time will allow the Parties to evaluate next steps in light of *Alaska Industrial Development and Export Authority v. U.S. Department of the Interior*, Case No. 3:24-cv-00051-SLG, a lawsuit challenging the Department of the Interior's ("Interior") cancelation of leases issued under the 2020 Leasing Program. The case is fully briefed and submitted to this Court for a decision. In that case, the Alaska Industrial Development and Export Authority ("AIDEA") seeks the reinstatement of its leases issued under the 2020 Leasing Program. Because the remedy AIDEA seeks could impact how the parties pursue the present case, continuing the stay in this case is appropriate.

Additional time will also allow the Parties to consider the potential impacts of forthcoming agency actions on the next steps in this case. Following Interior's adoption of a revised Leasing Program for the Coastal Plain of the Arctic National Wildlife Refuge on December 8, 2024, *see* Status Report, ECF No. 103 (Dec. 9, 2024), Interior announced that it will hold a lease sale on January 9, 2025. *See* Notice of Lease Sale and Notice of Detailed

Statement of Sale for the Coastal Plain 2025 Oil and Gas Lease Sale, 89 Fed. Reg. 99,270 (Dec. 10, 2024). Once the lease sale occurs, the Parties will know if any entities submitted bids for leases. Interior has committed to temporarily refrain from issuing any leases to third-party bidders that overlap with AIDEA's prior leases issued pursuant to the challenged 2020 Leasing Program. *See Alaska Industrial Development and Export Authority v. U.S. Department of the Interior*, Case No. 3:24-cv-00051-SLG, Unopposed Motion for Extension of Time, ECF No. 86 (Dec. 6, 2024). Continuing the stay in the present case until Interior determines whether to issue additional leases is appropriate because the Leasing Program defines the areas available for lease as well as lease terms and conditions, which are at issue in this case.

Following conferral, Defendants acknowledge that various events could occur in early 2025 that have the potential to affect the Coastal Plain Oil and Gas Program. Defendants further note, in light of the possibility of such events, that Plaintiffs do not wish to dismiss the above-captioned lawsuit at this time. Defendants agree that it may ultimately conserve the resources of the parties and the Court to continue the stay of proceedings in this case until February 28, 2025, when the parties can revisit the status of this litigation. Intervenor-Defendant State of Alaska does not oppose the request for a stay, while the other Intervenor-Defendants take no position.

Plaintiffs and Defendants therefore jointly request that this Court continue the stay of proceedings in this case to allow the Parties to consider the potential impacts of future Court and agency decisions on the present case. The Parties will submit a Joint Status

Report on or before February 28, 2025, to advise the Court of the Parties' positions regarding whether and how to proceed with this litigation.

RESPECTFULLY SUBMITTED this 31st day of December, 2024.

/s/ Megan R. Condon

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*Counsel for Defendants*

## CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of December, 2024, I electronically filed the foregoing JOINT STATUS REPORT AND MOTION TO CONTINUE STAY and PROPOSED ORDER with the Clerk of the Court for the United States District Court for the District of Alaska by using the CM/ECF system.

/s/ Megan R. Condon

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